

Federal Defenders OF NEW YORK, INC.

Southern District
81 Main Street, Suite 124
White Plains, NY 10601
Tel: (914) 428-7124 Fax: (914) 948-5109

Tamara L. Giwa
Executive Director

Jennifer L. Brown
Attorney-in-Charge

December 10, 2024

VIA EMAIL & ECF

The Honorable Victoria Reznik
United States Magistrate Judge
Southern District of New York
300 Quarropas Street,
White Plains, NY 10601

MEMO ENDORSED

Re: *United States v. Miguel Munoz, 24-mj-4101 (UA)*

Dear Honorable Judge Reznik:


I am writing to request a two-day extension to December 12, 2024, to meet Mr. Munoz's bond conditions.

Mr. Munoz made his initial appearance on November 26, 2024, before the Honorable Andrew E. Krause, and was release on consent with certain conditions. Amongst those conditions was a \$25,000 unsecured bond to be co-signed by two financial responsible persons. With the exception of surrendering his passport, which he was ordered to surrender by December 3, 2024, Mr. Munoz was given until December 10, 2024, to meet the other bond conditions. Since his release, Mr. Munoz's has met all of the bond conditions, including surrendering his passport on December 2, 2024, expect for the co-signor condition.

Two co-signors have been interviewed and approved; however, we require additional time to have them signed to the bond. We believe this can be accomplished within the next two days and we are requesting until December 12, 2024, to meet all of the bond conditions. I have consulted with the government through Assistant United States Attorney Jorja Knauer who does not object to this request. Therefore, we are request two additional days to meet the bond requirements.


Thank you for your time and consideration.

Sincerely,


Elizabeth K. Quinn
Counsel for Miguel Munoz

cc: Jorja Knauer, AUSA

APPLICATION GRANTED


Hon. Victoria Reznik, U.S.M.J.
December 10, 2024